# REMARKS

Upon entry of this amendment, claims 26, 49, and 52 will be amended and claim 53 will be added. No new matter has been added. The changes have been made solely to expedite prosecution of this application, and Applicants reserve the right to pursue the previous claims in this application and in other application.

The pending claims stand rejected under 35 USC 103 over various combinations of US Patent No. 5,737,739 ("Shirley"), US Patent No. 6,510,434 ("Anderson"), and US Patent No. 6,266,682 ("LaMarca"). Applicants respectfully request reconsideration in view of the changes to the claims and the following remarks.

### All of the Pending Claims Are Allowable Because the References Do No Teach or Suggest "Automatically Determining (or Assigning) a Second Document Tag"

According to some embodiments, a content publisher may generate a document, such as an investment research document, and provide the document to a controller. The content publisher may also assign a first document tag to the document, and the document tag is associated with a first domain having a single-rooted, hierarchical data structure.

Consider, for example, a content publisher who generates an investment research report about Microsoft Corporation. In this case, the content publisher might select "Company/West_Cost/Software/Microsoft" as an appropriate first document tag.

Claim 26 recites the step of "automatically determining an associated tag for the document based on a rule associated with the first document tag." By way of example, the rule might indicate that an associated tag of "Analyst/Goldman_Sachs/Ms._Jones" should be determined whenever the first tag indicates that the company is a software company with yearly earnings of more than 100 million dollars.

None of the references disclose or suggest this element.

Applicants gratefully acknowledge the statement in the Office Action that LaMarca does not disclose such an element.

Shirley discloses a knowledge base, including elements that are associated with multiple tags. Col. 3, lines 15-34. Some elements may be associated with query tags (*e.g.*, a query

element might state "Is the toner low in the copy machine?") while others are associated with corrective action tags (*e.g.*, a corrective action element might state "Re-fill the toner to solve the problem."). Cross-reference tags can also be provided to establish relationships between the query elements and the corrective action elements. In this way, the knowledge base can be used to provide a smart succession of queries to a repair person and then recommend an appropriate corrective action based on his or her responses.

The relationship between these elements is well illustrated in the left-hand portion of FIG. 2 of Shirley. The knowledge base 10 provides a Query (Q) to a repair person, who replies to the query with a Yes (Y) or No (N) answer. Based on the answer, another query can be provided to the repair person. In some cases, he or she is instructed to perform a Setup/Test (S/T) between queries. Finally, a Corrective Action (CA) is recommended to hopefully solve a problem.

According to the Office Action:

> Shirley et al. teaches ... automatically determining an associated tag for the document based on a rule associated with the first document tag (See column 3, lines 15-23, where the "markup language tag" is read on "first document tag" and "query tag" is read on associated tag.")

Applicants respectfully disagree.

Nowhere in Shirley is a tag <u>automatically determined</u> for a document based on a rule associated with a first document tag that was indicated by the content publisher. For example, when the designer of the knowledge base 10 indicates that a certain element should be assigned a corrective action tag, the system does not automatically suggest that a particular query tag or cross-reference tag should also be associated with that element.

Anderson discloses a database in which tags are associated with records in a database, such as a telephone directory. The various ways that tags may be defined for a record are described at col. 11, lines 6-63. In no instance is a tag <u>automatically determined</u> for a record based on a rule associated with a first tag that was assigned by a content publisher. Consider, for example, a person who adds a new record to a telephone directory and indicates that the record should be associated with a "restaurant" tag. Nothing in Anderson discloses that a tag from a different domain would automatically be determined in response to that indication.

Nor is such a feature obvious in view of these references. According to the Office Action, automatically determining an associated tag for a document based on a rule would have been obvious because it would let the publisher make documents freely available while retaining value-added features which could be exploited. Applicants respectfully do not understand this argument. While this desire might lead a publisher to assign tags to documents (without disclosing the tags), it would not motivate one of ordinary skill in the art to create a system in which a tag is <u>automatically determined</u> for a document based on a rule as recited in claim 26.

As a result, Applicants respectfully suggest that claim 26 and claims 38-48 dependent thereon are allowable. Claims 37 and 49-53 contain similar limitations and should therefore also be allowable.

<u>Claims 26 and 38-53 Are Allowable Because the References Do No Teach or Suggest "Transmitting an Indication of an Associated Tag, "Receiving an Indication ... Indicating Whether the ... Associated Tag Is Appropriate," and "Assigning a Second Document Tag ... Based on the Associated Tag and the Received Indication"</u>

As explained above, according to some embodiments an associated tag may be automatically determined for a document (*e.g.*, an associated tag of "Analyst/Goldman_Sachs/ Ms._Jones" might be determined when a content publisher assigns a first document tag of "Company/West_Cost/Software/Microsoft" to a document).

Note that at this point, the associated tag is not yet (and might never be) associated with the document itself. Also note that the automatically determined tag might not really be applicable for a particular document. That is, a rule might select a tag that is does not apply to the content of a particular document.

To address such a situation, claim 26 recites "<u>transmitting an indication of the associated tag to the content publisher</u>." For example, an email might be sent to the content publisher stating "Should this document be also associated with Analyst/Goldman_Sachs/Ms._Jones?"

Moreover, claim 26 recites "<u>receiving an indication</u> from the content publisher, the indication indicating <u>whether the automatically determined associated tag is appropriate</u>." For example, the content publisher might click on one Uniform Resource Locator (URL) link if he or she thought that the Analyst/Goldman_Sachs/Ms._Jones tag was appropriate and another URL link if it was not.

In addition, claim 26 recites "assigning a second document tag to the investment research document based on the associated tag and the received indication." For example, the associated tag of " Analyst/Goldman_Sachs/Ms._Jones" may become the second document tag associated with the document after it has been approved by the author. That is, the document would now associated with both the first document tag ("Company/West_Cost/Software/Microsoft") and the second document tag ("Analyst/Goldman_Sachs/Ms._Jones"). Both of these tags might then be used when a reader requests a certain type of document.

None of the cited references disclosure such features.

LaMarca does not disclose automatically determining a tag, let alone having a content publisher review the tag as recited in these elements.

Shirley also does not disclose these features. That is, a potential query tag or corrective action tag is not displayed to a system designer or repair person for their approval.

Anderson discloses that tags may be assigned to records but does not disclose that the tags are automatically determined, displayed to a content publisher, and then assigned to a record if approved by the content publisher.

Nor would such elements be obvious in view of these references. That is, since none of the references automatically select a tag, there would be no point in having a content publisher approve (or disapprove) a tag. As a result, Applicants respectfully suggest that claim 26 and claims 38-48 dependent thereon are allowable. Claims 49-53 contain similar limitations and should therefore also be allowable.


# CONCLUSION

Applicants respectfully assert that each of the claims is patentable over the cited references. Applicants therefore respectfully request that the Examiner's rejection of the pending claims be withdrawn and that all pending claims be allowed. Applicants' silence with respect to other comments made in the Office Action does not imply agreement with those comments.

If any issues remain, or if the Examiner has any further suggestions for expediting allowance of the present application, the Examiner is kindly invited to contact the undersigned via telephone at 203-972-0191.

Respectfully submitted,
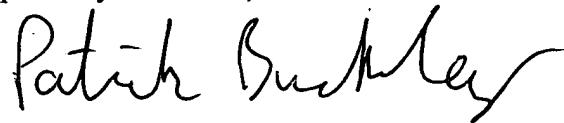
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